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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE: § CASE NO. 19-40756-13

**Rolanzo Demetres Beasley,
xxx-xx-2046**

**LaKeisha Antionette Beasley
xxx-xx-6766**

**412 Elm Creek Drive
McKinney, TX 75071**

Debtor(s)

**CARVANA, LLC
Movant**

V.

**Rolanzo Demetres Beasley
LaKeisha Antionette Beasley
Respondent(s)**

**DEBTOR'S RESPONSE TO MOTION OF CARVANA, LLC FOR RELIEF FROM
AUTOMATIC STAY**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Rolanzo Demetres Beasley and LaKeisha Antionette Beasley
Debtor(s) herein, and file this their Response to the Motion of CARVANA, LLC for Relief
from Automatic Stay and would respectfully show the Court as follows:

I.
ADMISSIONS & DENIALS

- 1.1 The Debtor admits the allegations contained in paragraph 1.
- 1.2 The Debtor admits the allegations contained in paragraph 2.
- 1.3 The Debtor admits the allegations contained in paragraph 3.
- 1.4 The Debtor admits the allegations contained in paragraph 4.
- 1.5 The Debtor admits the allegations contained in paragraph 5.
- 1.6 Debtor does not have information sufficient to admit or deny paragraph 6.
- 1.7 Debtor does not have information sufficient to admit or deny paragraph 7.
- 1.8 Debtor denies the allegations contained in paragraph 8.
- 1.9 Debtor denies the allegations contained in paragraph 9.
- 1.10 Debtor denies the allegations contained in paragraph 10.

II.
DEBTOR'S RESPONSE

- 2.1 The property which is the subject of the Motion of Movant's Motion is a vehicle and is necessary for an effective reorganization of the Debtor's finances.
- 2.2 Movant's interest in said property is adequately protected and Movant will suffer no harm if the automatic stay continues in force and effect.
- 2.3 The property is covered by insurance.
- 2.4 Debtor is current with the payments due to the Trustee pursuant to Debtor's Chapter 13 Preliminary Chapter 13 Plan.
- 2.5 The request for attorney's fees and costs are excessive in that no proper grounds for the action are stated in the Motion.

2.6 Debtor has provided for the post petition payments through direct pay to the Movant.

2.7 Debtor's Chapter 13 Plan is feasible.

WHEREFORE, PREMISES CONSIDERED, Debtor moves this Court upon hearing, to deny the Motion of CARVANA, LLC for Relief from Automatic Stay and for such other and further relief to which it may be justly entitled.

DATED this the 20th day of July, 2021.

Respectfully submitted,

JAMES K. INCE
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ATTORNEY FOR DEBTOR

By /s/James K. Ince
James K. Ince
Bar #10388920

CERTIFICATE OF SERVICE

This is to hereby certify that a true and correct copy of the above and foregoing Debtor's Response to the Motion of CARVANA, LLC for Relief from Automatic Stay has been forwarded via United States' regular mail, postage prepaid, or by electronic transfer by the clerk's office to the following parties on this the 20th day of July, 2021.

Rolanzo Demetres Beasley and LaKeisha Antionette Beasley
412 Elm Creek Drive
McKinney, TX 75071

Chase Berger, ESQ.
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Tim Truman, Standing Chapter 13 Trustee
Chapter 13 Trustee
6851 N. Loop 820
Suite 220
North Richland Hills, TX 76180

William T. Neary
Office of the U.S. Trustee
1100 Commerce Street, Suite 9C60
Dallas, TX 75242

By /s/ James K. Ince
James K. Ince